

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

NORDIC INTERACTIVE  
TECHNOLOGIES LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

Case No.: 6:20-CV-00064 (ADA)

Judge Alan D. Albright

**JURY TRIAL DEMANDED**

**PLAINTIFF'S REPLY TO UNOPPOSED MOTION  
TO WITHDRAW AS COUNSEL FOR PLAINTIFF**

[0001] SpencePC files this reply to its February 8, 2012 Motion to Withdraw. In support of its Motion to Withdraw, SpencePC responds as follows:

[0002] Plaintiff Nordic has placed SpencePC in a compromised professional and ethical position by, *inter alia*, refusing to honor the terms of a 2018 Engagement Letter between Nordic and SpencePC. Thus, good cause exists for why SpencePC should be permitted to withdraw from its representation of Nordic.

[0003] Contrary to statements by Nordic in opposition to the Motion to Withdraw, the parties have unsuccessfully attempted to amicably resolve these professional and ethical concerns for ***almost a year*** now. To that end, sometime prior to March 11, 2020, Nordic retained another law firm, Powers Taylor, adverse to SpencePC to attempt to resolve the dispute. The issue of potential termination of the engagement was first raised in subsequent written correspondence between SpencePC and Powers Taylor at least as early April 28, 2020. Thus, Nordic cannot feign surprise at SpencePC's motion to withdraw.

[0004] At the recommendation of SpencePC, Nordic previously retained Parker, Bunt & Ainsworth, PC to serve as local counsel in this matter. Upon information and belief, the attorneys from Parker, Bunt & Ainsworth, PC withdrew from this case over similar professional concerns.

[0005] Nordic subsequently retained new local counsel, Ni Wang & Massand. Notably, Nordic did so without input from, or discussion with, SpencePC. Upon information and belief, Ni Wang & Massand intends to remain as counsel in this matter. At Nordic's request, SpencePC is no longer communicating with Ni Wang & Massand.

[0006] Prior to filing of the instant motion to withdraw, on February 8, 2021, SpencePC contacted Samsung counsel and informed counsel of its intent to file a motion to withdraw. After some additional exchange of correspondence, Samsung counsel responded again on February 8, 2021, as follows:

For the district court, since Nordic has other counsel in the case, as long as this will not be worked to Samsung's prejudice (e.g., discovery requests served by Samsung will be responded to as due, etc.), we would not oppose.

[0007] SpencePC responded on February 8, 2021, as follows:

Thanks for your response. Unless and until the Court grants our motion, I confirm that we will of course work with you and the client to address all pending deadlines.

[0008] Prior to filing of the instant motion to withdraw, SpencePC also contacted Ni Wang & Massand to request assistance with its motion to withdraw. Nordic refused to permit Ni Wang & Massand to assist SpencePC, unnecessarily increasing the burden and expense for SpencePC to withdraw.

[0009] Despite present challenges, as stated above, SpencePC notified Nordic that it will continue to assist Nordic with all pending deadlines until the Court grants SpencePC's motion to withdraw. SpencePC did so despite Nordic refusing to respond in writing to SpencePC's requests for certain professional assurances related to the representation.

[0010] Despite Nordic's refusal to respond in writing to SpencePC with the requested professional assurances, SpencePC is nonetheless willing to agree to Nordic's request to remain as counsel for approximately two additional weeks from the filing of the motion to withdraw. Nordic has represented that it can retain new lead counsel during this time frame and that such change will not necessitate any changes to the pre-trial schedule or the trial date.

[0011] For all of these reasons, SpencePC respectfully requests that the Court grant its Motion to Withdraw, effective February 19, 2021.

Dated: February 12, 2021

Respectfully submitted,

**SPENCEPC.**

/s/ William Cory Spence

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**Attorneys for Plaintiff Nordic Interactive  
Technologies LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that, on February 12, 2021, a true and correct copy of the foregoing was served to all counsel of record via email.

/s/ William Cory Spence  
William Cory Spence